

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Local Exchange Carriers' Rates, ) CC Docket No. 94-97,  
Terms, and Conditions for ) Phase II  
Expanded Interconnection Through )  
Virtual Collocation for Special )  
Access and Switched Transport )

DOCKET FILE COPY ORIGINAL

TO: THE COMMON CARRIER BUREAU

PETITION FOR A CONDITIONAL EXTENSION

Southwestern Bell Telephone Company ("Southwestern Bell" or "SWBT"), through its attorneys, files this Petition with respect to the Order Designating Issues for Investigation released on September 19, 1995, by the Common Carrier Bureau ("Phase II Designation Order"). More specifically, pursuant to Section 1.46 of the Commission's Rules, Southwestern Bell seeks a limited and conditional extension for filing a complete response to Appendix C no later than November 6, 1995. No extension is being sought for the remainder of SWBT's Direct Case, which will be filed no later than the October 19, 1995, due date.

An extension for a complete response to Appendix C is appropriate and warranted given the amount of information that has been requested from Southwestern Bell. In comparison to the other local exchange carriers subject to the Phase II Designation Order, SWBT has many more rate elements for interconnector-designated equipment ("IDE") because of the individual IDE

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elements filed. All told, Southwestern Bell has 123 IDE rate elements and 32 non-IDE rate elements in its virtual collocation tariff. Accordingly, the burden of completing Appendix C with its spreadsheets is much greater and more time-consuming. After clarification of the requirements of Appendix C and by our calculation, more than 50,000 cells will need to be filled to respond fully for Charts 1 and 2. Although SWBT is working diligently to prepare a response to Appendix C and hopes to provide a complete response by October 19th, substantial concerns have arisen over the ability to meet the date set by the Bureau. Thus, SWBT seeks a conditional and limited extension in the event that the complete response to Appendix C is not finished.

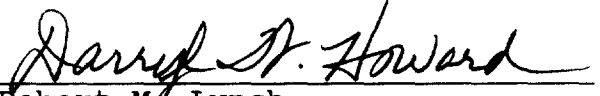
Even with the extension, SWBT nevertheless intends on filing on October 19th those portions of Appendix C that are available. In order to provide the Bureau with the relevant data based upon actual virtual collocation orders, SWBT has prioritized its response to Appendix C so that it should be completed for those rate elements that have experienced actual demand. Many of the possible IDE specified by potential interconnectors and included within SWBT's rate elements have not been ordered by anyone. In fact, only IDE from two of the eight vendors has been ordered and IDE from a third vendor has been inquired about since SWBT was required to make virtual collocation available. It is the IDE from those three vendors that Southwestern Bell has prioritized and should have available by October 19, 1995.

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Good cause having been shown, the Bureau should grant Southwestern Bell a conditional and limited extension for its response to Appendix C as requested herein.

Respectfully submitted,

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October 6, 1995

**CERTIFICATE OF SERVICE**

I, Katie M. Turner, hereby certify that the foregoing, "Petition for Conditional Extension" in Docket No. 94-97 has been filed this 6th day of October, 1995 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner", is written over a horizontal line.

Katie M. Turner

October 6, 1995

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